

Subject: RE: Full Circle United v. Bay Tek Entertainment, 20-cv-3395 (EDNY): Petro Subpoenas
Date: Monday, December 6, 2021 at 8:20:51 PM Eastern Standard Time
From: Lichtman, Leo
To: Michael Morris, Terrence Schaul
CC: 'Elaine Vorberg', Movit, Jeffrey, Lepera, Christine, Christina Casadonte-Apostolou, Reid Skibell, Paul Thanasides
Attachments: image001.gif, image002.png

Counsel,

We are not available on December 17. The options in December were never cleared with us, though we are amenable to dates in January. In all events however, this deposition cannot proceed until Petro is provided the recordings by your firm and a certification that no other recordings exist. If you do not provide them, we intend to seek relief before Justice Kornreich.

Best,



Leo M. Lichtman | Associate

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From: Michael Morris <mmorris@mcintyrefirm.com>

Sent: Friday, December 3, 2021 6:55 PM

To: Terrence Schaul <tschaul@mccarthyduffy.com>

Cc: evorberg@mccartjyduffy.com; Movit, Jeffrey <jmm@msk.com>; Lepera, Christine <ctl@msk.com>; Lichtman, Leo <lml@msk.com>; Christina Casadonte-Apostolou <christina@mcintyrefirm.com>; Reid Skibell <rskibell@hs-law.com>; Paul Thanasides <paul@mcintyrefirm.com>

Subject: [EXTERNAL] Re: Full Circle United v. Bay Tek Entertainment, 20-cv-3395 (EDNY): Petro Subpoenas

-EXTERNAL MESSAGE-

As I believe Mr. Thanasides previously indicated, we disagree that any such recordings would need to be delivered.

On December 3, 2021 at 6:44:25 PM, Terrence Schaul (tschaul@mccarthyduffy.com) wrote:

Have the recordings been delivered as requested and required?

Sent from my iPhone

On Dec 3, 2021, at 3:41 PM, Michael Morris <mmorris@mcintyrefirm.com> wrote:

Attached, please find the notice of taking Mr. Petro's deposition on 17 December.

We received your client's documents and thank him, but need them in their original format. Please let me know when we might expect them on non-PDF form.

Thank you,

Michael R. Morris
mmorris@mcintyrefirm.com
direct: 813.347.5569
cell: 561.707.8223

<mcintyre_icon.png>

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Thanks,

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MCINTYRE THANASIDES

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